

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' THIRD SET OF INTERROGATORIES TO
STATE DEFENDANTS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“Rule[s]”), Curling Plaintiffs hereby request that Defendants Brad Raffensperger, Rebecca N. Sullivan, Sara Tindall Ghazal, Matthew Mashburn, Anh Le, and the Georgia State Election Board (collectively, the “State Defendants”) answer the following interrogatories under oath, based upon all information and knowledge reasonably available to State Defendants, their attorneys, agents, and all others acting on their behalf, in accordance with the definitions and instructions below, within fifteen (15) days of service hereof. State Defendants may produce documents, electronically stored information, and tangible things specified herein at the offices of Krevolin & Horst, 1201 West Peachtree Street, Suite 3250, Atlanta, Georgia 30309.

DEFINITIONS

“All” and “each” shall be construed as all and each.

“And” as well as “or” are to be construed either disjunctively or conjunctively as necessary to bring within the scope of the Requests all documents or other information that might otherwise be construed to be outside their scope.

“Any” means each and every.

“Complaint” means “Third Amended Complaint” filed as Document No. 627 in the Action as modified in the Court’s Order (Dkt. No. 751) on Defendants’ Motions to Dismiss with respect to claims and parties that have been dismissed in whole or in part.

“Concerning,” “related to” or “relating to,” and “regarding” shall mean analyzing, alluding to, concerning, considering, commenting on, consulting, comprising, containing, contradicting, describing, dealing with, discussing, establishing, evidencing, identifying, involving, noting, recording, reporting on, related to, relating to, reflecting, referring to, regarding, stating, showing, studying, mentioning, memorializing, or pertaining to, in whole or in part.

“Constitute” means containing, comprising, embodying, making up, or to be the elements or components of.

“Current Election System” means any servers, desktops, laptops, tablets, smart phones, removable media (such as memory cards), ballot-marking devices (BMDs) (including ImageCastX Ballot-Marking Devices), BMD-adjacent equipment (including ImageCast Precinct Polling Place Scanner and associated printers or touchscreens), and any software and firmware installed on any such servers, devices, BMDs, or BMD-adjacent equipment (such as any version of the Election Management System (EMS), the BallotStation software, or the software associated with the “Dominion Voting Democracy Suite” (D-Suite)) used to record, tabulate, or secure votes in any election in the state of Georgia.

“Describe,” when used in connection with a communication, means to identify the date of the communication, the parties to the communication (speaker, listener, participant, sender, recipient, etc.), and the contents of the communication.

“Describe,” when used in connection with a meeting, means to identify the date of the meeting, the participants in the meeting, and the nature of each of the discussions at the meeting.

“Describe,” when used in connection with an agreement or contract, means to describe the parties to the agreement, the effective dates of the agreement, and all terms of the agreement.

“Document” and “documents” shall be synonymous in meaning and equal in scope to the usage of that term in Rule 34(a), and includes “tangible things” (as that term is used in Rule 34(a)(1)(b)) as well as anything that falls within the definition or meaning of “electronically stored information” (as that term is used in Rule 34(a)(1)(A)) or of “writings” or “recordings” in Federal Rule of Evidence 1001. A draft or non-identical copy of a document shall be considered a separate document within the meaning of the term “document.”

“Dominion” means Dominion Voting Systems, Inc., its predecessors, divisions, subsidiaries, affiliates, partnership and joint ventures, and all directors, officers, employees, contractors, representatives, and agents thereof, and any other person acting on its behalf or under its direction or control with respect to subject matter of these Topics.

“Dominion Worker” means employees, contractors, technicians, representatives, and agents of Dominion, and any other person acting on its behalf or under its direction or control with respect to subject matter of these Topics.

“Identify” means: (a) regarding an individual, the individual’s full name, present address (or, if unknown, the last known address), telephone number, business address, and place of employment and position; (b) regarding an entity, the name under which the entity customarily does business, its address, its telephone number,

and, if known, the identity of the individual believed to have the most knowledge with respect to the matters in the relevant interrogatory; (c) regarding any document with a production number, the production numbers stamped on the first and last pages of the document.

“Including” means including without limitation.

“Person” and “Entity” mean and include a natural person (i.e., an individual), a group of natural persons acting as individuals, a group of individuals acting in a collegial or concerted capacity (e.g., as a committee, a board of directors or advisors, etc.), an association, firm, corporation, joint venture, partnership, company, governmental unit or agency, and any other business, enterprise, or entity, unless otherwise limited or specified in the Requests.

“Optical Scanner” refers to devices, machines, or computers which produce coded signals corresponding to the marks or characters on a paper ballot and used for reading, registering, counting, or recording votes in elections, including without limitation those used at any time the in the State of Georgia.

“Relevant Time Period” means January 1, 2019 until the present unless otherwise indicated.

“Security Breach” means any incident that involved unauthorized access (whether by unauthorized parties or by authorized parties in excess of their actual

authorization) to any aspect of the Current Election System, regardless of whether any information or data was copied, altered, modified, deleted, taken, or stolen

“Security Vulnerability” means any known, identified, alleged, believed, or suspected risk (whether or not mitigated by other technology or procedures) of unauthorized access to any aspect of the Current Election System, including without limitation potential unauthorized access to voter registration information; potential unauthorized access to keys, passwords, or log-in credentials; an actual or possible ability to upload or implant malware; an actual or possible ability to alter vote tabulation, recording, results, reporting, or auditing; and potential alteration or loss of election results data.

“You” or “your” mean and include Secretary of State Brad Raffensperger, any of his predecessors, current and former members of the State Election Board, the divisions, departments, partnerships, and joint ventures of or subject to the control of either the Georgia Secretary of State or of the Georgia State Election Board, all directors, officers, employees, contractors, consultants, representative, and agents thereof, and any other person acting on its behalf or under its direction or control with respect to subject matter of these Topics, including to the extent applicable the Georgia Technology Authority.

INSTRUCTIONS

1. Unless indicated otherwise, the relevant period for each interrogatory is January 1, 2019, to present.
2. Each Interrogatory shall be answered fully, in writing, and under oath.
3. When answering these Interrogatories, provide any and all information in your possession, custody, or control.
4. For each Interrogatory response, identify the sources of all underlying facts.
5. If, after exercising a reasonable inquiry, you cannot fully answer any Interrogatory, so state and answer to the extent possible, specifying your inability to answer the remainder. State whatever information or knowledge you have concerning the unanswered portion. Estimated dates should be given when, but only when, exact dates cannot be supplied. Any estimates should be identified as such. The sources and means of derivation of each estimate should be specifically set forth.
6. If you contend that any of the Interrogatories is objectionable in whole or in part, state with particularity each objection, the basis for it, and the information requested to which the objection applies, and respond to the Interrogatory insofar as it is not deemed objectionable.

7. If, in responding to these interrogatories, you encounter any ambiguity in construing any interrogatory, definition, or instruction, set forth the reason you deem it ambiguous and the construction chosen or used in responding.

8. If, after exercising due diligence to obtain the requested information, you cannot answer any of the following interrogatories in full, answer to the extent possible and specify what efforts you made to obtain the requested information, the reasons you are unable to answer the remainder of the interrogatory, and what information and knowledge you have concerning the unanswered portion. If your answers are qualified, set forth the details of such qualifications.

9. Unless clearly indicated otherwise: (a) the use of a verb in any tense shall be construed as the use of that verb in all other tenses; (b) the use of the feminine, masculine, or neuter genders shall include all genders; and (c) the singular form of a word shall include the plural and vice versa, as necessary to bring within the scope of the Interrogatory all responses that might otherwise be construed outside of its scope.

10. The Interrogatories are deemed to be continuing so as to require the filing of supplemental responses pursuant to the Rules, including in the event that (a) you obtain information upon the basis of which you know that a response was in whole or in part incorrect when made, or though correct when made, is no

longer entirely correct, or that the circumstances are such that a failure to amend the answer is in substance a negligent or knowing misrepresentation, or (b) you locate or discover information responsive to one or more of the Interrogatories, which information has not previously been produced.

INTERROGATORIES

Interrogatory No. 27:

Identify and describe with specificity all measures taken to investigate, evaluate, remedy, mitigate, or otherwise address each of the Security Vulnerabilities and problems with the Current Election System identified in Dr. J. Alex Halderman's declarations, reports, and testimony in this matter.

(signature on following page)

Dated: July 28, 2021

Respectfully submitted,

/s/ David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2021, a copy of the foregoing **CURLING PLAINTIFFS' SECOND SET OF INTERROGATORIES TO STATE DEFENDANTS** was served on all counsel of record by electronic delivery of a PDF version.

/s/ David D. Cross
David D. Cross